

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
Civil Action No. 2:22-cv-01443-DCN

JANE ROUSE,)	
)	
Plaintiff,)	
)	
v.)	NOTICE OF REMOVAL
)	
HARRIS TEETER, LLC AND)	
ARAMARK UNIFORM & CAREER)	
APPAREL, LLC,)	
)	
Defendants.)	
)	

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, CHARLESTON DIVISION; THE COURT OF COMMON PLEAS FOR CHARLESTON COUNTY, SOUTH CAROLINA; AND ALL PARTIES AND ATTORNEYS OF RECORD:

YOU WILL PLEASE TAKE NOTICE that Defendant Aramark Uniform & Career Apparel, LLC (“Defendant”) hereby invokes the removal jurisdiction of the United States District Court for the District of South Carolina pursuant to 28 U.S. C. §§ 1332, 1441, and 1446 on the following grounds:

1. Plaintiff commenced this action by filing the Summons and Complaint with the Court of Common Pleas for Charleston County, State of South Carolina on March 15, 2022 and the filed an Amended Summons and Complaint on April 7, 2022. Aramark accepted service of the Amended Complaint on April 25, 2022.
2. A copy of all pleadings filed in Charleston County Court of Common Pleas are attached as Exhibit A.
3. This lawsuit is currently pending in the Court of Common Pleas for Charleston County, South Carolina, which is located within the above-named Division of this Court, and the time for Defendants to answer or respond to Plaintiff’s Amended Complaint has not expired.
4. At the time of the commencement of this lawsuit and the filing of this

Notice of Removal, Plaintiff and Defendants maintained the following citizenships:

- (a) Defendant Aramark Uniform & Career Apparel, LLC was and is a corporation organized, existing, and incorporated under Delaware law with its principal place of business in California; and
- (b) Upon information and belief, Defendant Harris Teeter, LLC was and is a corporation organized, existing, and incorporated under North Carolina law with its principal place of business in North Carolina; and
- (c) Plaintiff was and is a South Carolina citizen and resident. Defendant Harris Teeter, LLC consents to the Removal.

5. The Complaint is wholly based upon Plaintiff's claim of a slip and fall injury at a Harris Teeter grocery store in Mount Pleasant, South Carolina.

6. The amount in controversy exceeds the sum of \$75,000, exclusive of fees, interest, and costs.

7. Defendant will provide the Clerk of Court from which the lawsuit was removed with a copy of this Notice of Removal.

WHEREFORE, Defendant pray that this Notice for Removal be accepted as sufficient for removal of this action to this Court.

TURNER PADGET

/s David S. Cobb

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May 5, 2022

ATTORNEYS FOR ARAMARK UNIFORM &
CAREER APPAREL, LLC